

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: JAMIE W. WREN

CHAPTER 13

DEBTOR

CASE NO. 18-14948 JDW

**RESPONSE TO MOTION FOR RELIEF FROM STAY AND
ABANDONMENT FROM THE ESTATE BY 21ST MORTGAGE CORPORATION**

COMES NOW, Jamie W. Wren, Debtor, by and through his attorney of record, and files this his response to the Motion for Relief from Stay and Abandonment From the Estate by 21st Mortgage Corporation filed herein and would respectfully state unto the Court as follows, to-wit:

1. The Debtor admits the allegations contained in Paragraph I.
2. The Debtor admits the allegations contained in Paragraph II.
3. The Debtor admits the allegations contained in Paragraph III, however Debtor has filed an Amended Plan to add arrearage and ongoing payment to be paid through their Plan.
4. The Debtor denies the allegations contained in Paragraph IV.
5. The Debtor denies the allegations contained in the Paragraph beginning

“WHEREFORE, PREMISES CONSIDERED”, and continuing to the end of the motion.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that this Honorable Court will deny the Motion for Relief from Stay and Abandonment from the Estate and Other Relief filed herein and for such other, further and general relief to which the Debtor may be entitled.

Respectfully Submitted, this the 29th day of August, 2019.

s/ Karen B. Schneller
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CERTIFICATE OF SERVICE

I, Karen B. Schneller, attorney for Debtor(s), do hereby certify that I have this day forwarded by electronic means or via United States Mail, postage prepaid, of the above and foregoing Response to the following:

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Dated: August 29, 2019

/s/ Karen B. Schneller
KAREN B. SCHNELLER